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18 Attorneys for Defendants

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 NAVAJO HEALTH FOUNDATION – SAGE
22 MEMORIAL HOSPITAL, INC. (doing business
23 as “Sage Memorial Hospital”); an Arizona non-
24 profit corporation

25 Case No. 2:19-cv-00329-GMN-EJY

26 **JOINT STIPULATION
27 REGARDING DEFENDANTS’
28 MOTION TO STAY DISCOVERY**

29 Plaintiff,

30 v.

31 RAZAGHI DEVELOPMENT COMPANY,
32 LLC; a Nevada limited liability company (doing
33 business as “Razaghi Healthcare”), et al.,

34 Defendants.

35 IT IS HEREBY STIPULATED AND AGREED that the Motion to Stay Discovery
36 (ECF No. 170) filed by Defendants Razaghi Development Company, LLC, Ahmad Razaghi,
37 and Tausif Hasan (collectively, “Defendants”) shall be considered moot given the Court’s
38 recent Order (ECF No. 178) ruling on Defendants’ Motion to Dismiss Second Amended

1 Complaint (ECF No. 147), without prejudice to Defendant re-submitting said request to stay
2 discovery as appropriate once Plaintiff has submitted an amended complaint. This Court has
3 already granted the parties' prior Stipulation that they shall submit a proposed discovery
4 plan 14-days after Plaintiff files its amended complaint. Based on this information, the
5 parties agree that Plaintiff need not provide a response to Defendants' Motion to Stay
6 Discovery unless or until said motion is re-submitted by Defendants in the future.

7 The parties have so stipulated.

8 RESPECTFULLY SUBMITTED this 18th day of April 2022.

9

10 /s/ Paul Padda (with permission)
11 Kathleen Bliss, Esq.
12 Paul S. Padda, Esq.
13 David Stander, Esq.
14 Douglass A. Mitchell, Esq.
15 *Counsel for Plaintiff, Counterdefendant
and Third-Party Defendants*

16 /s/ Kris Leonhardt
17 Pavneet Singh Uppal, Esq.
18 Kris Leonhardt, Esq.
19 Nermana Pehlic, Esq.
20 Jeffrey D. Winchester, Esq.
21 *Counsel for Defendants*

22 IT IS SO ORDERED that the Joint
23 Stipulation Regarding Defendants' Motion
24 to Stay Discovery (ECF No. 184) is
25 GRANTED.

26 IT IS FURTHER ORDERED that
27 Defendants' Motion to Stay Discovery
28 (ECF No 170) is DENIED as moot and
without prejudice.

29 
30 Layna J. Zouchak
31 U.S. MAGISTRATE JUDGE

32 Dated: April 19, 2022